

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

CIVIL ACTION NO. 03-12499 MLW

TERRI L. PECHNER-JAMES)
and SONIA FERNANDEZ)
Plaintiffs)
)
VS.)
)
CITY OF REVERE, THOMAS)
AMBROSINO, MAYOR, CITY)
OF REVERE POLICE DEPT.)
TERRENCE REARDON, CHIEF)
OF POLICE, BERNARD FOSTER))
SALVATORE SANTORO, ROY)
COLANNINO, FREDERICK)
ROLAND, THOMAS DOHERTY)
JOHN NELSON, JAMES RUSSO)
MICHAEL MURPHY and)
STEVEN FORD)
Defendants)

PLAINTIFFS CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(A)(2)
ON MOTION TO COMPEL ANSWERS TO INTERROGATORIES

On June 13, 2006, the Plaintiffs served the following documents upon the Defendants, City of Revere, City of Revere Police Department, Thomas Ambrosino, Mayor, and Terrence Reardon, Chief of Police:

1. Notice of Consultation Pursuant To Local Rule 7.1 and Fed. R. Civ.P. 37(a)(2).
2. Motion For Order To Compel Defendant, Thomas Ambrosino, To Answer Interrogatories Pursuant To Fed. R. Civ. P. 37(a).
3. Motion For Order Compel Defendant, Terrence Reardon, To Answer Interrogatories Pursuant To Fed. R. Civ. P. 37(a).
4. Plaintiffs Memorandum In Support Of Motion For Order To Compel Defendant To Answer Interrogatories Pursuant To Fed. R.Civ.P. 37(a).

Exhibit 1: Plaintiffs Motion To Compel Production-3 pages

Defendants Answer To Request For Production 3-1-05
Boston Globe Article 3-12-05
Response of Edward Reardon, P.C.

- Exhibit 2: List of Documents Plaintiffs filed on April 19, 2006 pursuant to Docket No. 166.
- Exhibit 3: Defendants Motion To Strike Plaintiffs Opposition To Their Motion For Summary Judgment – 2 pages
- Exhibit 4: Letter from Walter H. Porr on the subject of Gonsalves dated March 2005.

The Plaintiffs are sending you the pleadings listed above pursuant to Local Rule 7.1 and Fed. R. Civ. P 37 (a)(2) and in an effort to meet, confer and try to resolve the issues of investigation, failure to investigate and documents sought by the pleadings. We look forward to hearing from you so that we can resolve these issues without court intervention.

The Plaintiffs requested that the parties meet and confer within ten (10) days of the date of the letter. On June 22, 2006, the Plaintiffs initiated a conference with the attorney for the Defendants, Walter Porr. The conference was held by telephone. It began at approximately 3:30 pm and ended at approximately 5:30 pm.

The Plaintiffs addressed all the objections raised by the Defendants. The Defendants agreed to provide some additional information in response to **some** of the Plaintiffs requests. They continued to resist providing responses to most of the Plaintiffs interrogatories.

The Defendants promised to provide **some** responses by July 7, 2006. Despite the agreement reached at the conference, the Defendants have failed to provide the agreed responses to the Plaintiffs.

The Plaintiffs have been unable to narrow or resolve the issues presented by the Defendants failure to respond to interrogatories. Despite the Plaintiffs good faith efforts, the extension of time granted to the Defendants, and the Defendants agreement to

respond, the Plaintiffs were unsuccessful. It is therefore necessary to file the attached motion, exhibits and this certificate of compliance with Local Rule 7.1(a)(2) and to seek court intervention

Terri Pechner-James and
Sonia Fernandez
By their attorney

/s/ James S. Dilday, esq.
James S. Dilday, Esq.